

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
: Case No.: 13-11902-MEW.  
CITICARE, INC., :  
: Debtor. :  
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**AGREED ORDER REGARDING  
PAYMENT OF ESCROWED FUNDS BY PLAN ADMINISTRATOR.**

Upon the Court's direction at the status conference in the instant case held on February 19, 2019, the undersigned parties having conferred regarding the distribution by Ira Spiegel, Esq., Plan Administrator, and due consideration having been given thereto; and sufficient cause having been shown therefor, it is hereby;

AGREED BY THE UNDERSIGNED, that Plan Administrator shall distribute funds now held to the extent set forth in the attached Schedule; and it is further

AGREED BY THE UNDERSIGNED, that the distributions agreed and allowed hereto shall not be utilized or cited as a precedent or prototype for future distributions and that all parties retain as to future distributions any and all objections that, absent this Agreed Order, they may have made to the distributions proposed in the attached Schedule, including without limitation the objection or objections that might have been made to the proposed distribution to Michael Lee. and it is further

AGREED that no further distributions shall be made except pursuant to a court order expressly authorizing such distribution or distributions.

/s/ Ira M. Spiegel, CPA

IMSpiegel, LLC  
1419 E. 101<sup>st</sup> Street,  
Brooklyn, New York 11236  
Tel.: 917-207-3600  
*Plan administrator*

/s/ Enid Nagler Stuart, Esq.

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/s/ Gabriel Del Virginia, Esq

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*Counsel for Reorganized Debtor*

/s/ Raymond J. Aab, Esq.

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New York, N.Y. 10006  
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*Attorney for Michael Lee*

/s/ Mark I. Fishman, Esq

NEUBERT, PEPE & MONTEITH, P.C  
195 Church Street, 13th Floor  
New Haven, Connecticut 06510  
Tel.: 203.821.2000  
*Counsel to Patient Care Ombudsman*

Dated: March , 2019  
New York, New York

**THE FOREGOING IS SO ORDERED,**

s/ Michael E. Wiles 3/13/2019

Hon. Michael E. Wiles,  
UNITED STATES BANKRUPTCY JUDGE.

CITICARE , INC.		CASE # 13-11902		SDNY					
PROPOSED PAYMENT OF CLAIMS BASED ON BALANCE OF EFFECTIVE DATE OWED									
PREPARED FEBRUARY 25, 2019									
		ALLOWED	PROJECTED	PAID	PAYING NOW AS				
		CLAIM AMOUNT	TO PAY EFFECTIVE	AGAINST EFFECTIVE	23.7% OF BALANCE				
				BALANCE					
<b>SECURED CREDITORS</b>									
INTERNAL REVENUE SERV.		1,100,000	275,000	175,000	100,000 <b>23,665</b>				
NYS DEPT OF TAX & FIN.		78,039	26,000	26,000	0				
BUSINESS RESOURCE		93,969	23,492	23,492	0				
NYC WATER BOARD		6,123	6,123	6,123	0				
<b>TOTAL SECURED CREDITORS</b>		<b>1,278,131</b>	<b>330,615</b>	<b>230,615</b>	<b>100,000 23,665</b>				
<b>ADMINISTRATIVE CREDITORS</b>									
NYS DEPT LABOR CLAIM		44,527	14,842	5,046	9,796 <b>2,318</b>				
NYS DEPT OF TAX & FIN.		111,304	37,101	12,614	24,487 <b>5,795</b>				
INTERNAL REVENUE SERV.		385,000	128,333	106,394	21,939 <b>5,192</b>				
MEDICAL OMBUSMAN FEE		156,592	52,197	17,747	34,450 <b>8,153</b>				
MEDICAL OMBUSMAN EXP		18,013	18,013	18,013	0 <b>0</b>				
MED. OMB. ATTORNEY FEE		51,476	17,159	5,834	11,325 <b>2,680</b>				
MED. OMB. ATTORNEY EXP		940	940	940	0 <b>0</b>				
EISNERAMPER LLP FEE		200,701	66,900	22,746	44,154 <b>10,449</b>				
EISNERAMPER LLP EXP		409	409	409	0 <b>0</b>				
GABE DEL VIRGINIA FEE		177,167	59,056	20,079	38,977 <b>9,224</b>				
GABE DEL VIRGINIA EXP		4,523	4,523	4,523	0 <b>0</b>				
127th ST. PROPERTIES LLC		669,115	669,115	669,115	0 <b>0</b>				
MICHAEL LEE		240,000	79,200	26,928	52,272 <b>12,370</b>				
<b>TOTAL ADMIN CREDITORS</b>		<b>2,059,767</b>	<b>1,147,789</b>	<b>910,388</b>	<b>237,401 56,181</b>				
<b>TOTAL ALL</b>		<b>3,337,898</b>	<b>1,478,404</b>	<b>1,141,003</b>	<b>337,401 79,846</b>				
UNITED STATES TRUSTEE									
IMSPIEGEL, LLC as PLAN ADMIN									
HMM CPAS as AUDITORS									
TOTAL PAYS									
<b>(A) HOLDING IN ACCOUNT</b>									
<b>ACCOUNT BALANCE BEFORE PAYMENTS</b>									
(A) Based on the above pays 1st quarter 2019 UST fee is \$975; 2nd quarter will be \$325 = \$1300									